

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	INDICTMENT
	)	
Plaintiff,	)	(18 U.S.C. § 371)
	)	(18 U.S.C. § 1028A)
v.	)	(18 U.S.C. § 1344)
	)	
(1) KARI LYNN GOODMAN,	)	
	)	
(2) NATHAN ALLEN MILLER, and	)	
	)	
(3) MICHELLE RAE SCHNEIDER,	)	
	)	
Defendants.	)	

CR10-329 Jne/AJB

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

1. At all times relevant to this Indictment, US Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.

2. At all times relevant to this Indictment, Postal Credit Union was a financial institution whose accounts were insured by the National Credit Union Share Insurance Fund.

COUNT 1

(Conspiracy to Commit Offenses Against the United States)

3. From at least in or about December 2006, and continuing until at least in or about February 2009, in the State and District of Minnesota, the defendants,

KARI LYNN GOODMAN,  
NATHAN ALLEN MILLER, and  
MICHELLE RAE SCHNEIDER,

did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with others known and unknown to the

SCANNED

DEC 09 2010

U.S. DISTRICT COURT ST. PAUL

1

FILED DEC 07 2010  
RICHARD D. SLETTEN, CLERK  
JUDGMENT ENTD \_\_\_\_\_  
DEPUTY CLERK \_\_\_\_\_

United States v. Kari Lynn Goodman, et al.

Grand Jury, to commit the following offenses against the United States:

a. Bank Fraud, that is, to knowingly defraud financial institutions and to obtain moneys, funds, and other property owned by, and under the custody and control of, financial institutions, by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Sections 1344;

b. Identity Fraud, that is, to knowingly transfer, possess, and use, without lawful authority, a means of identification of another person with the intent to commit, and to aid and abet, and in connection with, unlawful activity that constitutes a violation of Federal law and that constitutes a felony under applicable State law, in violation of Title 18, United States Code, Section 1028(a)(7); and

c. Aggravated Identity Theft, that is, to knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), in violation of Title 18, United States Code, Section 1028A(a)(1).

United States v. Kari Lynn Goodman, et al.

Object of Conspiracy

4. The object of the conspiracy was to use the means of identification of individual victims fraudulently to acquire money and property.

Manner and Means of Conspiracy

5. In execution and attempted execution of the scheme and artifice, the conspirators:

a. stole mail, or received and possessed from co-conspirators mail that they knew to be stolen, which mail contained checks and means of identification of individual victims;

b. stole property, or received and possessed from co-conspirators property that they knew to be stolen, which property contained checks and means of identification of individual victims;

c. used the stolen checks and identification information to produce false means of identification and counterfeit checks, with commercially-available computer software programs including Microsoft® Paint, VersaCheck®, and Checksoft™; and

d. used the false means of identification and counterfeit checks to obtain cash and property, by presenting the items to retail merchants and other businesses, which in

United States v. Kari Lynn Goodman, et al.

turn deposited the checks into accounts at financial institutions located in Minnesota.

Overt Acts of Conspiracy

6. In furtherance of the conspiracy and in order to effect the object of the conspiracy, the defendants and other individuals, both known and unknown to the Grand Jury, committed and caused to be committed the following overt acts, among others, in the State and District of Minnesota:

a. On or about December 13, 2006, in New Brighton, Minnesota, GOODMAN and MILLER possessed, without lawful permission and authority, checks and means of identification of numerous individuals, and counterfeit checks and Minnesota Driver's Licenses in the names of numerous individuals.

b. On or about March 22, 2008, at a retail store located in Roseville, Minnesota, GOODMAN presented a Minnesota Driver's License in the name of S.J., and a counterfeit check that was also in the name of S.J. but was drawn on the account of R.V., without their lawful permission and authority, in an attempt to purchase merchandise.

c. On or about July 31, 2008, at Bremer Bank, SCHNEIDER cashed a forged check in the name of H.H., which was stolen out of H.H.'s mailbox.

United States v. Kari Lynn Goodman, et al.

d. On or about August 3, 2008, at a retail store located in Owatonna, Minnesota, GOODMAN presented a Minnesota Driver's License in the name of B.H. and wrote and passed two checks in the name of B.H., without her lawful permission and authority, to purchase merchandise.

e. On or about September 20, 2008, in Shakopee, Minnesota, SCHNEIDER unlawfully obtained checks and means of identification of S.S., which she then used at the Mystic Lake Casino to obtain money without S.S.'s lawful permission and authority.

f. After September 20, 2008, GOODMAN and SCHNEIDER generated several counterfeit checks in the name of S.S., without S.S.'s lawful permission and authority, which they used to make purchases at various Minnesota businesses.

g. In or about October 2008, SCHNEIDER used a Minnesota Driver's License in the name of C.H., also stolen from the mail box of H.H., as a means of identification to cash numerous forged checks in the name of C.H.

h. On or about December 1, 2008, at a hotel in Bloomington, Minnesota, MILLER and SCHNEIDER possessed, without lawful permission and authority, checks and means of identification of numerous individuals, and counterfeit checks

United States v. Kari Lynn Goodman, et al.

and Minnesota Driver's Licenses in the names of numerous individuals.

i. From about December 2008 through at least February 2009, at various retail merchants in Minnesota, MILLER and SCHNEIDER used credit cards opened in the name of B.Z., without his lawful permission and authority, to incur charges totaling more than \$19,000.

j. In or about January 2009, GOODMAN generated counterfeit checks in the business name of Miller Charities, using personal information of D.M., without D.M.'s lawful permission and authority, and used the checks to make purchases at various Minnesota businesses.

7. All in violation of Title 18, United States Code, Section 371.

COUNTS 2-3  
(Bank Fraud)

8. From about November 2006 and continuing through at least February 2009, in the State and District of Minnesota, the defendants,

**KARI LYNN GOODMAN and  
NATHAN ALLEN MILLER,**

devised a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, and credits owned by and under the

United States v. Kari Lynn Goodman, et al.

custody and control of financial institutions, by means of false and fraudulent pretenses, representations, and promises.

Purpose of the Scheme and Artifice

9. The purpose of the scheme and artifice was to obtain money from financial institutions by false and fraudulent means.

Scheme and Artifice

10. The defendants fraudulently obtained moneys, funds, and credits from financial institutions by: (1) negotiating real checks issued on accounts of other persons; (2) which accounts were maintained by financial institutions; (3) without the other persons' knowledge or authorization; (4) by forging the names of the other persons; and (5) obtaining property and items at the various locations of negotiation.

11. The defendants also fraudulently obtained moneys, funds, and credits from financial institutions by: (1) negotiating counterfeit checks bearing legitimate account numbers issued on accounts of other persons; (2) which accounts were maintained by financial institutions; (3) without the other persons' knowledge or authorization; (4) by forging the names of the other persons; and (5) obtaining property and items at the various locations of negotiation.

United States v. Kari Lynn Goodman, et al.

Execution of the Scheme and Artifice

12. On or about the dates set forth below, within the State and District of Minnesota, the defendants,

**KARI LYNN GOODMAN and  
NATHAN ALLEN MILLER,**

did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud US Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and Postal Credit Union, a financial institution whose accounts were at all times relevant to the charges insured by the National Credit Union Share Insurance Fund, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in the following fraudulent transactions set forth in each count below:

Count	Defendant	Date (on or about)	Description
2	GOODMAN	8/3/2008	Used, at a retail store in Owatonna, Minnesota, check no. 6535 in the amount of \$428.64, which check was in the name of B.H. and drawn on an account at US Bank.



United States v. Kari Lynn Goodman, et al.

Count	Defendant	Date (on or about)	Description
3	MILLER	2/16/2009	Used, at a retail store in Shakopee, Minnesota, check no. 3161 in the amount of \$1,262.15, which check was in the name of B.Z. and drawn on an account at Postal Credit Union.

13. All in violation of Title 18, United States Code, Section 1344.

**COUNTS 4-5**

(Aggravated Identity Theft)

14. On or about the dates set forth below, in the State and District of Minnesota, the defendants,

**KARI LYNN GOODMAN and  
NATHAN ALLEN MILLER,**

did knowingly use, without lawful authority, means of identification of other persons, during and in relation to bank fraud, a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit:

Count	Defendant	Date (on or about)	Description
4	GOODMAN	8/3/2008	Unlawful use of name, bank routing number, and bank account number of B.H., during commission of Bank Fraud as alleged in Count 2.

United States v. Kari Lynn Goodman, et al.

Count	Defendant	Date (on or about)	Description
5	MILLER	2/16/2009	Unlawful use of name, bank routing number, and bank account number of B.Z. during commission of Bank Fraud as alleged in Count 3.

15. All in violation of Title 18, United States Code, Section 1028A.

**Forfeiture Allegations**

Counts 1 through 3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

As the result of the offenses alleged in Counts 1 through 3 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations charged in Counts 1 through 3 of the Indictment.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21,

United States v. Kari Lynn Goodman, et al.

United States Code, Section 853(p), as incorporated by Title 28,  
United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections  
371, 981(a)(1)(C), and 1344, and Title 28, United States Code,  
Section 2461(c).

A TRUE BILL

---

UNITED STATES ATTORNEY

---

FOREPERSON